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8 -and-

9 **WILLKIE FARR & GALLAGHER LLP**

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20 *Counsel for Ad Hoc Group of Subrogation Claim Holders, and on behalf of Joining*  
21 *Subrogation Claim Holders*

22 **UNITED STATES BANKRUPTCY COURT**  
23 **NORTHERN DISTRICT OF CALIFORNIA**  
24 **SAN FRANCISCO DIVISION**

25 In re:

26 PG&E CORPORATION,

27 - and -

28 PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

Case No. 19-30088

Chapter 11

(Lead Case)

(Jointly Administered)

Date: July 24, 2019

Time: 9:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

\*All papers shall be filed in the lead case, No.  
19-30088 (DM)

**Joinder Motion**

**JOINDER OF AMICA MUTUAL INSURANCE COMPANY, BG RESOLUTION PARTNERS I-A, L.L.C. (AN AFFILIATE OF THE BAUPOST GROUP, L.L.C.), ENCOMPASS INSURANCE COMPANY, FIRE INSURANCE EXCHANGE, HARTFORD ACCIDENT & INDEMNITY COMPANY, LIBERTY INSURANCE CORPORATION, MERCURY INSURANCE, NATIONWIDE MUTUAL INSURANCE COMPANY, AND UNITED SERVICES AUTOMOBILE ASSOCIATION TO MOTION OF THE AD HOC GROUP OF SUBROGATION CLAIM HOLDERS FOR RELIEF FROM THE AUTOMATIC STAY**

Amica Mutual Insurance Company, BG Resolution Partners I-A, L.L.C. (an affiliate of The Baupost Group, L.L.C.), Encompass Insurance Company, Fire Insurance Exchange, Hartford Accident & Indemnity Company, Liberty Insurance Corporation, Mercury Insurance, Nationwide Mutual Insurance Company, and United Services Automobile Association (collectively, the “**Joining Subrogation Claim Holders**”), each in their individual capacities, hereby joins in the *Motion of the Ad Hoc Group of Subrogation Claim Holders for Relief from the Automatic Stay* [Docket No. 2863] (together with the accompanying memorandum of law, the “**Lift Stay Motion**”), and all of the arguments set forth therein.<sup>1</sup> Each of the Joining Subrogation Claim Holders is a member of the Ad Hoc Subrogation Group, and is the named insurer (or a transferee of the named insurer) of a TCC Plaintiff (as defined in the Lift Stay Motion, as set forth below):

<b><u>TCC Plaintiff</u></b>	<b><u>Joining Subrogation Claim Holders</u></b>
John Caslin	Amica Mutual Insurance Company
Elizabeth Fourkas	Nationwide Mutual Insurance Company (property)  BG Resolution Partners I-A, L.L.C., an affiliate of The Baupost Group, L.L.C. (as purchaser of claims from CSAA Insurance Group) (auto)
Phyllis Lowe	Nationwide Mutual Insurance Company
Raymond Breitenstein	BG Resolution Partners I-A, L.L.C., an affiliate of The Baupost Group, L.L.C. (as purchaser of claims from CSAA Insurance Group)

<sup>1</sup> Capitalized terms not defined herein have the meanings ascribed to them in the Lift Stay Motion.

	Encompass Insurance Company (affiliate of Allstate)
Don Louis Kamprath	Hartford Accident & Indemnity Company
William Edelen	United Services Automobile Association
Greg and Christina Wilson	Liberty Insurance Corporation
Monte Kirven	Fire Insurance Exchange (property) United Services Automobile Association (auto)
Carmen and Armando Berriz	Mercury Insurance

Dated: July 12, 2019

**WILLKIE FARR & GALLAGHER LLP**

/s/ Benjamin P. McCallen

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